

LEXINGTON HOUSING AUTHORITY



Lexington Housing Authority

FY2016 MOVING TO WORK ANNUAL PLAN

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SECTION I

INTRODUCTION

The Lexington-Fayette Urban County Housing Authority (LHA) enters its fifth year as a Moving to Work (MTW) agency with the submission of the FY2016 Annual Plan. The LHA submitted a formal application to the federal U.S. Department of Housing and Urban Development (HUD) seeking admittance to the Moving to Work (MTW) demonstration program in November 2010. HUD announced LHA's selection for program admittance in March 2011, and the Housing Authority formally entered the MTW program on November 10, 2011 with the execution of an MTW Agreement between HUD and LHA.

The LHA was established in 1934 to provide safe and desirable affordable housing to low and moderate-income individuals and families while partnering with community agencies to promote increased self-sufficiency and a higher quality of life for its residents. The agency provides housing assistance to nearly 4,000 low-income households in Lexington-Fayette County through the public housing and Housing Choice Voucher (HCV) programs. The Authority is governed by a Board of Commissioners, a group of dedicated citizens and local officials appointed in accordance with state housing law, who establish and monitor agency policies and are responsible for preserving and expanding the Authority's resources and ensuring the Authority's ongoing success.

The mission of the Lexington-Fayette Urban County Housing Authority (LHA) MTW Program is to:

Serve as a prudent financial steward of federal, state and local resources, endeavoring to more effectively provide safe and desirable affordable housing, while furthering the self-sufficiency of families within Lexington-Fayette County.

SHORT TERM GOALS**Rental Assistance Demonstration (RAD)**

Renovation of the LHA's 206-unit Centre Meadows site (formerly Pimlico public housing site) is fifty percent near completion of an 18-month construction schedule. Construction began at the site in March of 2014 after the financing plan was approved between the LHA, HUD and the private equity investors. The renovation project is the result of HUD's Rental Assistance Demonstration (RAD), created to assist public housing authorities nationwide to address a \$26 billion dollar backlog of overdue capital improvements.

The LHA applied for the RAD program in October of 2012 which meant the agency sought private equity partners to raise funds to finance the cost of the renovation. Through RAD, public housing units are converted to the Housing Choice Vouchers as the long-term source of federal project subsidy, however, there are no additional subsidy dollars provided by HUD under RAD.

When the site is reoccupied during FY2016, it will be available for low-income families that must pay 30% of their income towards the rent and will be subject to the LHA's admissions and occupancy policies for project-based vouchers.

Waiting List

The Lexington Housing Authority (LHA) opened the waiting list for the Housing Choice Voucher (Section 8) program for the first time since 2010. Pre-applications were accepted online only January 5 to January 9, 2015. During those five days, 4,045 on-line applications were submitted, an average of 34 applications per hour. Applicants were directed to the LHA's website for instructions on how to apply and the link to access the applications. Computer access was made available at the LHA's central office for applicants who did not have computer access. In addition, a list of community partners was made available for those people who needed assistance to apply and computer access. Pre-applications were selected by random lottery. In the coming months, HCV staff will begin calling in those 500 randomly selected applicants to complete the eligibility process and anticipate seeing all of those applicants over a 24-month period.

Additionally, the LHA's public housing waiting list which is partially closed was opened in January 2015 for two and three bedroom units at self-sufficiency sites. The LHA anticipates keeping the public housing waiting list open through the first half of 2015 to address vacancy issues.

The LHA's HCV program is also proposing a new waiting list preference for households that include an adult household member who is a veteran. Currently, the LHA provides 25 special purpose vouchers for social service partner, Volunteers of America (VOA) to provide stable, tenant-based voucher housing to low-income families while they receive services provided by the partner agency. During FY2016 the LHA will offer an additional 75 vouchers for families that include an adult household member who is a veteran. VOA addresses the needs of homelessness, addiction, developmental disabilities, HIV and low-income seniors through a variety of services.

The LHA's participation in the HUD-sponsored HCV Rent Reform Study is underway and will continue through 2021. The controlled study sets forth alternative rent calculation and recertification strategies that will be implemented at four public housing authorities across the country in order to fully test the policies nationally. The proposed alternative rent policies will include five key features: simplify income determination and rent calculation; implement triennial income recertification; streamline interim

certifications to eliminate income review for most household composition changes and moves to new units; require the TTP is the greater of 28% gross annual income or the minimum rent with a portion of the TTP will be paid directly to the landlord, and; simplify the policy for determining utility allowances.

The LHA began calling in HCV households in April 2015, randomly assigned to either the control group of the study group. The Study Group vouchers will be managed using the proposed policies. The Control Group vouchers will be managed using the existing policies. Eligible participants for both the Study and Control Groups will include only those with vouchers that are administered under the Moving To Work (MTW) Program. Non-MTW Vouchers (i.e., Veterans Assisted Special Housing, Moderate Rehabilitation, and Shelter Plus Care), Special Partner programs (i.e., Bluegrass Domestic Violence, Bluegrass Regional Mental Health - Mental Retardation Board, Inc., and Volunteers of America), Enhanced Vouchers, and HUD Project Based Vouchers are excluded from the Study. Others excluded from the study include: elderly and disabled households; households currently using the childcare expense deduction to determine adjusted annual income; households headed by people older than 56 years of age who will become seniors during the course of the study; households currently participating in HCV Family Self-sufficiency (FSS) and HCV Homeownership programs; and households that contain a mix of eligible and non-eligible household members.

LONG TERM GOALS

To ensure LHA's participation in the MTW demonstration program meets the specific needs of the Lexington-Fayette community, the agency will continue to craft local initiatives to address long term needs and meet the following MTW objectives:

1. Increase the number and quality of affordable housing choices throughout the Lexington-Fayette community;
2. Increase the number of families moving toward self-sufficiency;
3. Increase and strengthen the number of community partnerships benefitting residents with special needs, especially those not adequately served elsewhere in the community and those requiring a "service-enriched" housing environment; and
4. Reduce the agency's administrative costs while limiting the administrative burdens placed on staff and residents.

To further both the federal and local MTW objectives listed above; the LHA has sought and received HUD approval to implement 16 MTW activities since entering the program in 2011. Through the submission of the FY2016 Plan, the Authority seeks approval for one new activity and to modify the hardship policy for ongoing rent reform activities, as well as revise a local version of HUD form 9886 that is signed by the tenant at the triennial recertification. Below is a chart summarizing the LHA's MTW activities. The numbers in the statutory objectives column of the table corresponds with the numbered descriptions below.

Statutory Objectives

1. To reduce costs and achieve greater cost effectiveness in federal expenditures;
2. To give incentives to families with children where the head of household is working; is seeking work; or is preparing for work by participating in job training, educational programs, or programs that assist people to obtain employment and become economically self-sufficient; and
3. To increase housing choices for low-income families.

Activity	Activity Description	Plan Year Proposed/ Modified	Status	Statutory Objective
1	Minimum Rent Increase to \$150 Across All Housing Programs	-FY2012-13 -FY2014 Significantly Modified	Implemented agency-wide April 1, 2014	2
2	Management Team III Rent Reform Controlled Study – No Rent Reduction Requests for 6 Months After Initial Occupancy for Bluegrass HOPE VI Public Housing Residents	-FY2012-FY2013	Closed Out FY2014 and replaced with Activity 13	1
3	Triennial Recertification of Connie Griffith Towers and HCV Elderly/Disabled Households	-FY2012-FY2013 Significantly - Modified FY2014 -FY2016 Request Approval to change HUD Form 9886	Ongoing	1
4	HCV Rent Reform Controlled Study: No Rent Reduction Requests for 6 Months After Initial Occupancy	FY2012-FY2013	Closed Out FY2015	1 & 2
5	Streamlined HQS Inspection Policy for HCV Units	- FY2012-13 -FY2014 Significantly Modified	Implemented FY2015 w/ Emphasys Elite Software	1
6	Biennial Housekeeping Inspection Policy for Public Housing Residents	FY2012-FY2013	-Not Implemented -Closed out	1
7	Public Housing Acquisition Without Prior HUD Approval	FY2012-FY2013		3
8	Conversion of Appian Hills Public Housing to Project-Based Vouchers	-FY2012-FY2013 -FY2014 Significantly Modified	Modified in FY2014 - Pimlico Converted to PBV w/ RAD/Not Implemented	3
9	Development of Project-Based Voucher Units at 800 Edmond Street	FY2012-FY2013	Not Implemented Resources used for RAD revitalization of Pimlico	3

Activity	Activity Description	Plan Year Proposed/ Modified	Status	Statutory Objective
10	HCV (Tenant-Based) Special Partners Programs	-FY2012-FY2013 -FY2014 Significantly Modified	Ongoing	3
11	Local, Non-Traditional Use of MTW Funds: Emergency Reserves for Connie Griffith-Ballard Towers	- FY2012-FY2013 -FY2014 Significantly Modified	Not Implemented until/ necessary for emergency capital repairs	3
12	Local, Non-Traditional Use of MTW Funds for HCV Special Partners With Designated Units	FY2014	Ongoing	2 & 3
13	Local Self-Sufficiency Admissions and Occupancy Requirements	FY2014	Ongoing Implemented April 1, 2014	2
14	Elimination of Earned Income Disallowance	FY2015	Ongoing	1
15	Limit HCV Landlord Rent Increases to the Lesser of 2%, the HUD Fair Market Rent (FMR) or Comparable Rent	FY2015	Ongoing	1
16	HUD/MDRC HCV Rent Reform Demonstration	FY2015	Ongoing	2
17*	Limit Interim Re-examinations for Public Housing Households	FY2016	Proposed	1

*New activity.

SECTION II – GENERAL HOUSING AUTHORITY OPERATING INFORMATION

(II) General Housing Authority Operating Information											
Annual MTW Plan											
II.1.Plan.HousingStock											
A. MTW Plan: Housing Stock Information											
Planned New Public Housing Units to be Added During the Fiscal Year											
AMP Name and Number	Bedroom Size							Total Units	Population Type *	# of UFAS Units	
	0	1	2	3	4	5	6+			Fully Accessible	Adaptable
PIC Dev. # /AMP PIC Dev. Name	0	0	0	0	0	0	0	0	N/A	0	0
PIC Dev. # /AMP PIC Dev. Name	0	0	0	0	0	0	0	0	N/A	0	0
PIC Dev. # /AMP PIC Dev. Name	0	0	0	0	0	0	0	0	N/A	0	0
PIC Dev. # /AMP PIC Dev. Name	0	0	0	0	0	0	0	0	N/A	0	0
Total Public Housing Units to be Added								0			
* Select Population Type from: Elderly, Disabled, General, Elderly/Disabled, Other If Other, please describe: Description of "other" population type served											
Planned Public Housing Units to be Removed During the Fiscal Year											
PIC Dev. # / AMP and PIC Dev. Name	Number of Units to be Removed		Explanation for Removal								
PIC Dev. # /AMP PIC Dev. Name	0		N/A								
PIC Dev. # /AMP PIC Dev. Name	0		N/A								
PIC Dev. # /AMP PIC Dev. Name	0		N/A								
Total Number of Units to be Removed		0									

(II) General Housing Authority Operating Information													
Annual MTW Plan													
II.1. Plan. Housing Stock													
A. MTW Plan: Housing Stock Information													
Planned New Public Housing Units to be Added During the Fiscal Year													
AMP Name and Number	Bedroom Size							Total Units	Population Type *	# of UFAS Units			
	0	1	2	3	4	5	6+			Fully Accessible	Adaptable		
PIC Dev. # /AMP	0	0	0	0	0	0	0	0	N/A	0	0		
PIC Dev. Name													
PIC Dev. # /AMP	0	0	0	0	0	0	0	0	N/A	0	0		
PIC Dev. Name													
PIC Dev. # /AMP	0	0	0	0	0	0	0	0	N/A	0	0		
PIC Dev. Name													
PIC Dev. # /AMP	0	0	0	0	0	0	0	0	N/A	0	0		
PIC Dev. Name													
Total Public Housing Units to be Added								0					
* Select Population Type from: Elderly, Disabled, General, Elderly/Disabled, Other													
If Other, please describe: Description of "other" population type served													
Planned Public Housing Units to be Removed During the Fiscal Year													
PIC Dev. # / AMP and PIC Dev. Name	Number of Units to be Removed		Explanation for Removal										
PIC Dev. # /AMP	0		N/A										
PIC Dev. Name													
PIC Dev. # /AMP	0		N/A										
PIC Dev. Name													
PIC Dev. # /AMP	0		N/A										
PIC Dev. Name													
Total Number of Units to be Removed		0											
New Housing Choice Vouchers to be Project-Based During the Fiscal Year													
Property Name	Anticipated Number of New Vouchers to be Project-Based *		Description of Project										
Centre Meadows	206		All 206 units at the Pimlico public housing development were converted to project-based vouchers under HUD's Rental Assistance Demonstration (RAD) program. The site has been vacant for construction since FY2014. The Housing Authority does not expect to begin leasing these units until fall 2015.										
N/A	0		N/A										
N/A	0		N/A										
N/A	0		N/A										
Anticipated Total New Vouchers to be Project-Based		206		Anticipated Total Number of Project-Based Vouchers Committed at the End of the Fiscal Year		206		Anticipated Total Number of Project-Based Vouchers Leased Up or Issued to a Potential Tenant at the End of the Fiscal Year				206	
*New refers to tenant-based vouchers that are being project-based for the first time. The count should only include agreements in which a HAP agreement will be in place by the end of the year.													
Other Changes to the Housing Stock Anticipated During the Fiscal Year													
N/A													
N/A													
N/A													
Examples of the types of other changes can include but are not limited to units that are held off-line due to the relocation of residents, units that are off-line due to substantial rehabilitation and potential plans for acquiring units.													

General Description of All Planned Capital Fund Expenditures During the Plan Year									
1408-Mgmt. Improvements-PHA Wide software upgrades \$171,267 1410-Administration-PHA Wide Capital Fund Fee \$107,042 1430-Fees and Costs-PHA Wide A & E Fees \$53,762 KY004000001-Bainbidge-PineVly-Const: Site improvements; building exterior improvements; non-dwelling equipment \$180,600 KY004000002-Unnamed: Site improvements; dwelling unit interior/exterior improvements \$141,910 KY004000003-Unnamed: Site improvements; dwelling unit interior/exterior improvements \$72,525 KY004000004-CG: Energy Management System Replacement \$15,000 KY004000010-BG Apartments: Hot water tank replacement \$19,231 KY004000013-BG Phase III: MF Bldg. exterior door lock & security repair/replacement/upgrade \$12,500 KY004000015-Bridlewood Apts.: MF Bldg. exterior door lock & security repair/replacement/upgrade \$32,500 KY004000033-Grand Oaks Apts.: MF Bldg. exterior door lock & security repair/replacement/upgrade \$50,000									

II.2.Plan.Leasing		
B. MTW Plan: Leasing Information		
Planned Number of Households Served at the End of the Fiscal Year		
MTW Households to be Served Through:	Planned Number of Households to be Served*	Planned Number of Unit Months Occupied/Leased***
Federal MTW Public Housing Units to be Leased	1136	13632
Federal MTW Voucher (HCV) Units to be Utilized	2155	25860
Number of Units to be Occupied/Leased through Local, Non-Traditional, MTW Funded, Property-Based Assistance Programs **	679	8148
Number of Units to be Occupied/Leased through Local, Non-Traditional, MTW Funded, Tenant-Based Assistance Programs **	0	0
Total Households Projected to be Served	3970	47640
<p>* Calculated by dividing the planned number of unit months occupied/leased by 12.</p> <p>** In instances when a local, non-traditional program provides a certain subsidy level but does not specify a number of units/households to be served, the PHA should estimate the number of households to be served.</p> <p>***Unit Months Occupied/Leased is the total number of months the PHA has leased/occupied units, according to unit category during the fiscal year.</p>		
Reporting Compliance with Statutory MTW Requirements		
<p>If the PHA has been out of compliance with any of the required statutory MTW requirements listed in Section II(C) of the Standard MTW Agreement, the PHA will provide a narrative discussion and a plan as to how it will return to compliance. If the PHA is currently in compliance, no discussion or reporting is necessary.</p>		
<p>LHA is currently in compliance with MTW statutory requirements.</p>		
Description of any Anticipated Issues Related to Leasing of Public Housing, Housing Choice Vouchers and/or Local, Non-Traditional Units and Possible Solutions		
Housing Program	Description of Anticipated Leasing Issues and Possible Solutions	
PBV	<p>206 units at the Pimlico public housing development were converted to project-based vouchers under HUD's Rental Assistance Demonstration (RAD) program. The site has been vacant for construction since FY2014. The Housing Authority does not expect to begin leasing these units until late 2015 and leaseup to follow over the next 30-60 days. The LHA received funding for the approved RAD Centre Meadows project through HCV as scheduled effective 1/01/2015. While the units are under construction and not yet occupied, there is no expense for unit utilization during this period. The LHA opened the waiting list for Centre Meadows in August 2015 to be prepared with applicants who may be eligible to occupy half the units when they are ready in October or November of 2015.</p>	
Public Housing	<p>Public Housing occupancy is down due to the waiting list depleted of eligible applicants for self-sufficiency sites that have a work requirement. The LHA will continue to periodically open the waiting list to seek eligible housing applicants. The LHA will also consider using MTW authority to make changes to the work requirement.</p>	
Local, Non-Traditional Units	<p>The LHA meets periodically with these special partners to encourage utilization these vouchers. At present, the LHA has no leasing issues with these vouchers.</p>	

II.3.Plan.WaitList				
C. MTW Plan: Wait List Information				
Wait List Information Projected for the Beginning of the Fiscal Year				
Housing Program(s) *	Wait List Type**	Number of Households on Wait List	Wait List Open, Partially Open or Closed***	Are There Plans to Open the Wait List During the Fiscal Year
Federal MTW Public Housing Units	Community-Wide	2164	Partially Open	Wait list will remain partially open
Federal MTW Housing Choice Voucher Program	Community-Wide	23	Partially Open	Wait list will remain partially open
Non-Traditional MTW Housing Assistance Program	Program Specific	0	Open	Wait list will remain open
Rows for additional waiting lists may be added, if needed.				
* Select Housing Program : Federal MTW Public Housing Units; Federal MTW Housing Choice Voucher Program; Federal non-MTW Housing Choice Voucher Units; Tenant-Based Local, Non-Traditional MTW Housing Assistance Program; Project-Based Local, Non-Traditional MTW Housing Assistance Program; and Combined Tenant-Based and Project-Based Local, Non-Traditional MTW Housing Assistance Program.				
** Select Wait List Types : Community-Wide, Site-Based, Merged (Combined Public Housing or Voucher Wait List), Program Specific (Limited by HUD or Local PHA Rules to Certain Categories of Households which are Described in the Rules for Program Participation), None (If the Program is a New Wait List, Not an Existing Wait List), or Other (Please Provide a Brief Description of this Wait List Type).				
*** For Partially Open Wait Lists, provide a description of the populations for which the waiting list is open.				
Federal MTW Public Housing Units: Elderly population served at the Connie Griffith Manor site ONLY and 2 and 3 bedroom waiting list for self-sufficiency units is currently open.				
Federal MTW Housing Choice Voucher Program: Tenant-based HCV special partner programs (Domestic Violence Bluegrass Mental Health and Volunteers of America)				
Housing Program and Description of the populations for which the wait list is open				
If Local, Non-Traditional Housing Program, please describe:				
1) Canaan House - Individuals who have been diagnosed with a mental illness; 2) Urban League of Lexington-Fayette County - Elderly Individuals; 3) New Beginnings - Individuals who have been diagnosed with a mental illness; 4) OASIS Rental Assistance Housing Program - Families in need of financial literacy, credit management, and homeownership resources				
5) Chrysalis House - Parents with children: who have recently been released from jail, or are homeless, and who are substance abuse treatment program graduates; 6) One Parent Scholar House - Single parents who are full-time students in a post-secondary educational institution				
7) HOPE Center - Persons who have a substance abuse problem and are in need of voluntary or court-mandated treatment; 8) Serenity House Place - Parents with children: who have recently been released from jail, are homeless and who are substance abuse treatment program graduates				
If Other Wait List Type, please describe:				
N/A				
N/A				
N/A				
If there are any changes to the organizational structure of the wait list or policy changes regarding the wait list, provide a narrative detailing these changes.				
The LHA's HCV program is also proposing a new waiting list preference for households that include an adult household member who is a veteran. The LHA will provide 75 special purpose vouchers for social service partner, Volunteers of America (VOA) to provide stable, tenant-based voucher housing to low-income families that include an adult household member who is a veteran. The LHA's public housing program will also offer a preference to families that include an adult household member who is a veteran. The public housing and HCV program will offer a residency preference for families in Fayette County.				

SECTION III -**Proposed MTW Activities: HUD Approval Requested****Activity 17****Limit Interim Re-examinations for Public Housing Households****Description**

By limiting interim re-examinations, this initiative will reduce the administrative burden involved in processing annual and interim re-examinations and reduce the rate of errors in calculating adjusted income and rent. The staff time saved through this initiative will allow for better efficiency in processing annual and interim re-examinations.

Meets Statutory Objective

Interim reductions in the rent portion will be made, but limited to reduce administrative costs to the LHA and to provide incentives to employed families to remain employed.

For households who are not elderly or disabled, interim adjustments will be limited as follows:

- Households may only request an interim reduction once between regularly scheduled re-examination periods. However, see the Hardship Policy below for exceptions to this limitation;
- Interim decreases will only be processed for loss of employment due to reduction in work force or closure of the place of employment where employment income loss is not covered by severance or separation benefits.
- No reduction based upon loss of job will be processed until the LHA receives documentation of eligibility or ineligibility for unemployment benefits;
- Decreases in public assistance income that are the result of a finding of fraud or a failure to comply with work/school requirements will not be processed.
- In calculating the reduction, all household income, including previously unreported income, will be counted;
- The household's loss of income must be expected to last longer than four (4) months;
- All interim rent reductions will be temporary.
- An exception to this policy allows for an interim at any time for compliance in 50058 reporting and is limited to the following: the addition of a household member, the death or removal of a household member.

After receiving a rent decrease, a family becomes obligated to report any new income within ten business days. A follow-up interim will be conducted to include new income, and the resulting increase will be implemented after providing the family with 30-day notice of the increase.

Anticipated Impact of Activity on Statutory Objectives

The activity relates to the statutory objective to reduce cost and achieve greater cost effectiveness in federal expenditures by reducing the amount of time housing management specialist spend processing interim re-exams. The time savings to housing management staff will allow for more efficient use of time for other housing management issues.

Schedule for Achieving Objective

Upon HUD approval LHA would notify all public housing households of the initiative and the hardship policy 60 days prior to implementation.

Standard HUD Metrics

CE #1: Agency Cost Savings			
Unit of Measurement Total cost of task in dollars (decrease).			
Baseline (FY2015)	Benchmark (FY2016)	Outcome	Benchmark Achieved?
\$1,929 $\$26.25 \times .50 = \13.13 per interim X 147 Interims = \$1,929 Management Specialist hourly rate x time to do an interim	\$972 $\$13.13 \times 74$ Interims	TBD	TBD
Data Source: Emphasys			

CE #2: Staff Time Savings			
Unit of Measurement Total time to complete the task in staff hours (decrease).			
Baseline (FY2015)	Benchmark	Outcome	Benchmark Achieved?
147 interims	74 interims	TBD	TBD
Data Source: Emphasys			

CE #5: Increase in Agency Rental Revenue			
Unit of Measurement Rental revenue in dollars (increase).			
Baseline	Benchmark	Outcome	Benchmark Achieved?
\$1,797,912 Rental revenue prior to implementation of the activity.	\$2,157,494 Expected rental revenue after implementation of the activity.	TBD	TBD

SS #1: Increase in Household Income			
Unit of Measurement Average earned income of households affected by this policy in dollars (increase).			
Baseline	Benchmark	Outcome	Benchmark Achieved?
\$15,764 Average earned income of households affected by this policy prior to implementation of the activity (in dollars).	\$18,917 Expected average earned income of households affected by this policy prior to implementation of the activity.	TBD	TBD

SS #3: Increase in Positive Outcomes in Employment Status				
<i>Report the Baseline, Benchmark and Outcome data for each type of employment status for those head(s) of households affected by the self-sufficiency activity.</i>				
Unit of Measurement				
Report the following information separately for each category:	Baseline	Benchmark	Outcome	Benchmark Achieved?
(6a) Other – Households reporting earned income	616 Actual head(s) of households reporting earned income prior to implementation of the activity.	0 Expected head(s) of households reporting earned income after implementation of the activity.	TBD	TBD
(6b) Other – Households with no earned income	59 Head(s) of with no earned income prior to implementation of the activity.	0 Expected head(s) of households with no earned income after implementation of the activity.	TBD	TBD

SS #4: Households Removed from Temporary Assistance for Needy Families (TANF)			
Unit of Measurement Number of households receiving TANF assistance (decrease).			
Baseline	Benchmark	Outcome	Benchmark Achieved?
32 Households receiving TANF prior to implementation of the activity.	16 Expected number of households receiving TANF after implementation of the activity (number).	TBD	TBD

SS #8: Households Transitioned to Self Sufficiency			
Unit of Measurement Number of households transitioned to self sufficiency (increase). The PHA may create one or more definitions for "self sufficiency" to use for this metric. Each time the PHA uses this metric, the "Outcome" number should also be provided in Section (II) Operating Information in the space provided.			
Baseline	Benchmark	Outcome	Benchmark Achieved?
309 Households transitioned to self-sufficiency (Households with the head of household/co-head or spouse annually earning \$15,080 or more) prior to implementation of the activity.	616 Expected households transitioned to self sufficiency (<<PHA definition of self-sufficiency>>) after implementation of the activity (number).	TBD	TBD

Authorizations Cited

Authorizations Detailed in Attachment C or D of the Standard MTW Agreement

Initial, Annual and Interim Income Review Process

Item C.4. The Agency is authorized to restructure the initial, annual and interim review process in the public housing program in order to affect the frequency of the reviews and the methods and process used to establish the integrity of the income information provided. *This authorization waives certain provisions of sections 3(a)(1) and 3(a)(2) of the 1937 Act and 24 C.F.R. 966.4 and 960.257, as necessary to implement the Agency's Annual MTW Plan.*

Hardship Policy for Interim Re-examinations

The LHA will adopt a policy that may limit the ability of a participating family to request an interim re-examination between normally scheduled annual re-examinations. This restriction applies to all households who are not defined as elderly or disabled households. However, a household will be exempted from the limit of one rent decrease each year if it qualifies for a hardship exemption. To be considered for a hardship exemption the participant household must demonstrate that it is experiencing a financial hardship due to an unexpected or unprecedented economic burden on the family.

At any time between required annual re-examinations and after one interim reduction in rent, a family residing in public housing may submit a written request for an exemption to the interim rent reduction policy. A household must meet the following requirements in order to receive a hardship exemption; all cases will be reviewed on a case-by-case basis:

1. The participant household must provide proof it is unable to continue to pay the current rent share because of a financial hardship, including:
 - The family's income has decreased because of loss of employment through no fault of the family and the family demonstrates efforts towards regaining employment;
 - A death has occurred in the family which eliminates a prior source of income; or
 - Other circumstances determined to warrant an exemption by the LHA.
2. The qualifying financial hardship must be long-term (a minimum of 4 months).
3. Allowing an additional interim re-examination beyond the normal one-per-year option could lower the household's rent (but only as low as the \$150 minimum rent) for up to 6 months.
4. Setting the household's rent at the minimum level for up to 6 months.
5. Setting the household's TTP at 30 percent of current income (but no lower than the \$150 minimum rent), for up to 6 months.

Until the request for a hardship exemption is reviewed and approved by the LHA the participating household is expected to continue to pay its portion of rent and utilities as previously agreed. The family is required to abide by all other requirements for continued occupancy and failure to do so is grounds for termination.

**SECTION IV – Approved MTW Activities: HUD Approval Previously Granted
IMPLEMENTED ACTIVITIES****Activity 1: Increase Minimum Rent to \$150 Across All Housing Programs****Plan Year Activity Approved and Implemented**

Proposed FY 2012 – FY 2013 for Pimlico Apartments

Implemented May 1, 2012

Activity Expanded FY2014 to all Public Housing Units and HCV Units

Implemented April 1, 2014

Description

All non-elderly/non-disabled public housing and Housing Choice Voucher (HCV) tenants pay \$150 in minimum rent. The LHA increased the minimum rent to \$150 across all housing programs (Section 8 & 9) excluding elderly and/or disabled households and households participating in HCV special partner programs in April 2014. The initiative promotes self-sufficiency by encouraging heads-of-household to work, while raising much-needed revenue.

Centre Meadows (formerly Pimlico) a 206-unit apartment community was recently converted to Project-Based Voucher and remains vacant during renovation but is anticipated to open during FY2016. Once occupied, tenants at this site will be subject to the \$150 minimum rent.

Non-Significant Changes or Modifications During FY2016

The LHA does not anticipate any non-significant changes or modifications during the FY2016 Plan year.

Changes or Modifications Metrics, Baselines or Benchmarks During FY2016

The LHA does not anticipate any changes or modifications during the FY2016 Plan year to benchmarks and/or metrics for this activity.

Attachment C or D Authorization(s) Changes

There have been no changes in Attachment C or D authorizations since this activity was proposed and approved.

Significant Change or Modifications to the Activity Since Approval

There are no significant changes or modifications to the activity as previously proposed and approved.

Activity 3) Triennial Recertification of Connie Griffith Towers and HCV Elderly/Disabled Households

Plan Year Activity Approved and Implemented

Activity Proposed, Approved, and Implemented – FY2012-FY2013 Plan

For Connie Griffith Manor households

Activity Expansion Approved and Implemented – FY2014 Plan

Expanded to include HCV elderly and disabled households on a fixed income

Description of Activity and Status Update

This activity is ongoing. The Housing Authority implemented this activity for all 183 units at Connie Griffith Towers, an elderly high rise, during FY 2012 – FY 2013. Through this activity the LHA is recertifying households at Connie Griffith once every three years instead of annually. Between triennial recertifications, whenever the federal government adjusts benefits paid through fixed-income programs like Social Security and SSI, the LHA reserves the right to adjust resident household incomes and rent payments accordingly.

The success of that initiative prompted staff to request authority to expand the activity to HCV elderly and disabled families on a fixed income. As the vast majority of elderly and disabled households in the HCV programs rely on fixed-income sources, there is little variation in household income on an annual basis. In reference to this activity, households on a fixed income are defined as any household with any amount of income from a fixed income source like Social Security, SSDI, or pension income.

Additionally, the LHA created a "local version" of HUD-Form 9886 that would be signed by the tenant at the triennial recertification. Households who experience a significant loss of income, an increase in allowable medical expenses, or a change in family composition may request an interim recertification at any time. Households whose income increases \$200 or more per month must request an interim recertification.

Non-Significant Changes or Modifications During FY2016

The LHA is requesting approval to make one revision on the local version of HUD Form 9886 – Local Authorization for the Release of Information for households that have triennial recertification. Currently the form expires after 36 months. LHA is requesting to extend the expiration date to 40 months to accommodate recertifications that have been delayed that must be rescheduled due to unforeseen reasons. Extending the expiration date to 40 months will be a benefit to our clients, many of whom must reschedule due to issues facing low-income elderly and disabled populations such as medical emergencies, transportation issues, etc.

Changes or Modifications to the Metrics, Baselines or Benchmarks During FY2016

The LHA does not anticipate any changes or modifications during the FY2016 Plan year to benchmarks and/or metrics for this activity.

Attachment C or D Authorization(s) Changes

There have been no changes in Attachment C or D authorizations since this activity was proposed and approved.

Significant Changes or Modifications to the Activity Since Approval

There are no significant changes or modifications to the activity as previously proposed and approved.

Activity 5) Streamlined HQS Inspection Policy for Housing Choice Voucher

Plan Year Activity Approved and Implemented

Proposed and Approved FY2012 – FY2013 Plan

Significantly Modified FY2014 Plan

Implemented FY2015

Description

Until June 25, 2014, HUD regulations mandated that housing authorities inspect every HCV unit at least annually to ensure they meet Housing Quality Standards (HQS). Section 220 of the 2014 Appropriations Act now allows housing authorities to comply with the requirement to inspect assisted housing units in the HCV program by inspecting such units not less than biennially, rather than annually. While LHA intends to uphold HUD's high standards of decent, safe, and sanitary housing maintained in good repair for all HCV households, the Authority believes it can achieve this outcome more cost-effectively through a new *Star Rating System* for HCV property owners.

The LHA did not fully implement this activity during FY2015 as LHA's software provider continues to work on programming for this activity, LHA expects HCV tenant and landlord files to be functioning in the new software program that during FY2016. During FY 2015 LHA HCV inspectors began implementing inspections based on the star-rating.

Non-Significant Changes or Modifications During FY2016

The LHA does not anticipate any non-significant changes or modifications to this activity during FY2016.

Changes or Modifications to the Metrics, Baselines or Benchmarks During FY2016

The baseline and benchmark for this metric were established in FY2015 as data was not readily available due to software issues when HUD Standard Metrics were made a requirement in FY2014.

Attachment C or D Authorization(s) Changes

There have been no changes in Attachment C or D authorizations since this activity was proposed and approved.

Significant Changes or Modifications to the Activity Since Approval

There are no significant changes or modifications to the activity as previously proposed and approved.

CE #1: Agency Cost Savings				
Unit of Measurement	Baseline (FY2015)	Benchmark (FY2016)	Outcome	Benchmark Achieved?
Total cost of task in dollars (decrease).	\$32,868 2,739 Initial and Annual Inspections \$24.00 per hour times 30 minutes to complete an inspection.	\$16,440 1,370 Initial and Annual Inspections @ \$24.00 per hour times 30 minutes to complete an inspection.	TBD	TBD
Data Source: Emphasys.				

CE #2: Staff Time Savings				
Unit of Measurement	Baseline (FY2015)	Benchmark (FY2016)	Outcome	Benchmark Achieved?
Total time to complete the task in staff hours (decrease).	1370 hours 2,739 Inspections@ 30 minutes each	685 hours 1,370 Inspections @ 30 minutes each	TBD	TBD
Data Source: Emphasys.				

Activity 10) HCV Tenant-Based Special Partners Programs

Plan Year Activity Approved and Implemented

Activity Proposed, Approved, and Implemented in FY 2012 – FY 2013

Description

LHA partners with three social service agencies in the Lexington area to provide stable, tenant-based voucher housing to low-income families while they receive services provided by the partner agency. (LHA partners with an additional eight social service agencies that provide designated, fixed housing to low-income families; these partners are addressed in Activity 12 of this Plan.) These “special partner programs” serve some of Lexington’s most vulnerable low-income populations, those who need wraparound services in order to stabilize their family situation and begin working to increase self-sufficiency. Targeted populations include the mentally ill, the homeless, those recovering from alcohol or drug addiction, and parents who have recently been released from jail.

Through the approval of its FY 2012 – FY 2013 MTW Annual Plan, the LHA received permission to require that participants relinquish their tenant-based voucher at the time they graduate from or otherwise leave the program offered by the special partner, so another family may benefit from the housing and programming offered by the special partner.

The approval of this activity has permitted the LHA to provide an admissions preference to families eligible for and willing to participate in these special partner programs as a condition of continued assistance.

Households receive HCV tenant-based assistance through the following special partner programs.

HCV Special Partner	Description of Households Served	Families Selecting Private Market Units
Bluegrass Domestic Violence (BGDV)	Victims of domestic violence, dating violence, sexual assault, and stalking	25
Bluegrass Regional Mental Health - Mental Retardation (BGMHMR)	Persons with severe mental illness or substance abuse diagnoses who have completed treatment and are involved in recovery services	22
Volunteers of America (VOA)	Homeless individuals and families	25
Total Units		77

While LHA hopes the majority of these families will subsequently seek unsubsidized housing in the private market, these households will also be eligible to apply for public housing or another HCV voucher (including Family Self-Sufficiency vouchers) through the Authority’s normal application procedures.

Non-Significant Changes or Modifications During FY2016

The LHA does not anticipate any non-significant changes or modifications during the FY2016 Plan year.

Changes or Modifications to the Metrics, Baselines or Benchmarks During FY2016

The baseline and benchmark for this metric were established in FY2015 as data was not readily available due to software issues when HUD Standard Metrics were made a requirement in FY2014.

Attachment C or D Authorization(s) Changes

There have been no changes in Attachment C or D authorizations since this activity was proposed and approved.

Significant Changes or Modifications to the Activity Since Approval

There are no significant changes or modifications to the activity as previously proposed and approved.

Activity 10 – HCV Tenant-Based Special Partner Programs			
CE #4: Increase in Resources Leveraged			
Unit of Measurement – Amount leveraged prior to implementation of the activity (in dollars). This number may be zero.			
Baseline (FY2015)	Benchmark (FY2016)	Outcome	Benchmark Achieved?
\$274,905 VOA - \$120,538 BGDV - \$119,075 BGMHMR - \$35,292	\$274,905	TBD	TBD
Data Source: Special Partner Reporting and PHA financial records.			

Activity 10 – HCV Tenant-Based Special Partner Programs			
SS #1: Increase in Household Income			
Unit of Measurement – Average earned income of households affected by this policy in dollars (increase).			
Baseline (FY2015)	Benchmark (FY2016)	Outcome	Benchmark Achieved?
\$6,022 (Average) VOA - \$3,417 BGDV - \$6,000 BGMHMR - \$8,649	\$15,080	TBD	TBD
Data Source: Special Partner Reporting			

Activity 10 – HCV Tenant-Based Special Partner Programs			
SS #3: Increase in Positive Outcomes in Employment Status			
Unit of Measurement – Employment Status: Category 5 Unemployed (reporting no earned income)			
Baseline (FY2015)	Benchmark (FY2016)	Outcome	Benchmark Achieved?
36 VOA – 17 BGDV – 10 BGMHMR – 9	29	TBD	TBD
Data Source: Special Partner Reporting			

Activity 10 – HCV Tenant-Based Special Partner Programs			
SS4: Households Removed from Temporary Assistance for Needy Families (TANF)			
Unit of Measurement – Number of households affected by Activity #10 receiving TANF assistance (decrease).			
Baseline (FY2015)	Benchmark (FY2016)	Outcome	Benchmark Achieved?
19 VOA – 11 BGDV -8 BGMHMR – 0	17	TBD	TBD
Data Source: Special Partner Reporting			

Activity 10 – HCV Tenant-Based Special Partner Programs			
SS8: Households Transitioned to Self-Sufficiency			
Unit of Measurement – Number of households transitioned to self-sufficiency (increase).			
For this activity, self-sufficiency is defined as any household that has earned income of at least ¹ \$15,080 per year.			
Baseline (FY2015)	Benchmark (FY2016)	Outcome	Benchmark Achieved?
10 VOA- 8 BGDV – 2 BGMHMR – 0	20	TBD	TBD
¹ \$15,080 = Federal minimum wage (\$7.25/hour) x 40-hour work week x 52 weeks of work per year			
Data Source: Special Partner reporting.			

Activity 10 – HCV Tenant-Based Special Partner Programs			
HC #3: Decrease in Wait List Time			
Unit of Measurement – Average applicant time on wait list in months (decrease).			
Baseline	Benchmark	Outcome	Benchmark Achieved?
60 months	6 months	Yes	Yes
Data Source: Special Partner reporting			

Activity 10 – HCV Tenant-Based Special Partner Programs			
HC #5: Increase in Resident Mobility			
Unit of Measurement – Households able to move to a better unit and/or neighborhood of opportunity prior to implementation of the activity (number). This number may be zero.			
Baseline (FY2015)	Benchmark (FY2016)	Outcome	Benchmark Achieved?
38	72	TBD	TBD
Data Source: Special Partner reporting.			

Activity 12) Local, Non-Traditional Use of MTW Funds for Special Partners

Plan Year Activity Approved and Implemented

This activity was proposed and implemented in FY2014 and is ongoing.

Description

HCV staff met with representatives of the seven (7) special partner programs prior to implementation and signed Memoranda of Understanding (MOUs) in December 2013, and the activity was implemented in January 2014.

The Authority currently provides monthly rental subsidy of \$124,360 to seven (7) special partners who have agreed to house and provide wraparound social services to a minimum of 358 families with special needs. During FY2015 LHA special partner agencies served a total of 679 families, an increase of 321 (53%) in households served. These agencies serve individuals with mental illness and/or substance abuse issues; individuals recently released from prison or jail; families in need of financial literacy, credit management, and homeownership resources; single parents enrolled full-time in higher education; and homeless individuals and families.

With Housing Authority approval, special partner organizations are permitted to require that participants reside in designated service-enriched housing units in order to receive rental subsidy; and

With Housing Authority approval, special partner organizations are permitted to house program participants in HUD-defined special housing types. Within these special housing type units, partner organizations will also be permitted to request Housing Authority approval to house up to two unrelated adults in a zero- or one-bedroom unit.

Those seven agencies are as follows:

Special Partner Program	Description of Households Served	# of Vouchers Provide	Actual Families Served in FY2015
Canaan House	Individuals who have been diagnosed with a mental illness	17	17
Hope Center	Persons who have a substance abuse problem and are in need of voluntary or court-mandated treatment	144	296
New Beginnings Bluegrass, Inc.	Individuals who have been diagnosed with a mental illness	24	31
OASIS Rental Assistance Housing Program	Families in need of financial literacy, credit management, and homeownership resources	30	53
One Parent Scholar House	Single parents who are full-time students in a post-secondary educational institution	80	140
Serenity Place (Chrysalis House)	Parents with children: 1) who have recently been released from jail or are homeless and 2) who are substance abuse treatment program graduates	40	108
Urban League of Lexington-Fayette County	Elderly individuals	23	34
Total Special Partner Units		358	679

Explanation of any Non-Significant Changes or Modifications Since

The LHA does not anticipate any non-significant changes or modifications during the FY2016 Plan year.

Changes or Modifications to the Metrics, Baselines or Benchmarks During FY2016

The baselines and benchmarks for metrics were established in FY2015 as data was not readily available due to software issues when HUD Standard Metrics were made a requirement in FY2014.

Attachment C or D Changes

There have been no changes in Attachment C or D authorizations since this activity was proposed and approved.

Significant Changes or Modifications to the Activity Since Approval

There are no significant changes or modifications to the activity as previously proposed and approved.

Activity 12) Local, Non-Traditional Use of MTW Funds for Special Partners			
*SS7: Increase in Agency Rental Revenue			
Unit of Measure – PHA rental revenue in dollars (increase).			
Baseline (FY2015)	Benchmark (FY2016)	Outcome	Benchmark Achieved?
\$58,790	\$58,790	TBD	Yes
Data Source: Special Partner reporting.			

Activity 12) Local, Non-Traditional Use of MTW Funds for Special Partners			
SS8: Households Transitioned to Self-Sufficiency			
Unit of Measure – Number of households transitioned to self-sufficiency (increase).			
For this activity, self-sufficiency is defined as any household that has earned income of at least ¹ \$15,080 per year.			
Baseline (FY2015)	Benchmark (FY2016)	Outcome	Benchmark Achieved?
95	105	TBD	TBD
¹ \$15,080 = Federal minimum wage (\$7.25/hour) x 40-hour work week x 52 weeks of work per year			
Data Source: Special Partner reporting.			

Activity 12) Local, Non-Traditional Use of MTW Funds for Special Partners			
HC #5: Increase in Resident Mobility			
Unit of Measurement – Households able to move to a better unit and/or neighborhood of opportunity prior to implementation of the activity (number). This number may be zero.			
Baseline (FY2015)	Benchmark (FY2016)	Outcome	Benchmark Achieved?
109	120	TBD	TBD
Data Source: Special Partner reporting.			

Activity 12) Local, Non-Traditional Use of MTW Funds for Special Partners			
HC #6: Increase in Homeownership Opportunities			
Unit of Measurement – Number of households that purchased a home as a result of the activity (increase).			
Baseline (FY2015)	Benchmark (FY2016)	Outcome	Benchmark Achieved?
0	2	TBD	TBD
Data Source: Special Partner reporting.			

Activity 12) Local, Non-Traditional Use of MTW Funds for Special Partners			
HC #7: Households Assisted by Services that Increase Housing Choice			
Unit of Measurement – Number of households receiving services aimed to increase housing choice (increase).			
Baseline (FY2015)	Benchmark (FY2016)	Outcome	Benchmark Achieved?
679	747	TBD	TBD
Data Source: Special Partner reporting.			

Activity 13) Local Self-Sufficiency Admissions and Occupancy Requirements Activity

Plan Year Activity Approved and Implemented

Proposed and approved in FY 2014, this activity was implemented April 1, 2014 and is ongoing.

Description

LHA created this activity with the aim of eliminating loopholes that a small but significant number of residents use to avoid work requirements at its public housing self-sufficiency units. Through this activity, the LHA has the authority to:

- a) Impose a minimum earned income calculation for families residing at self-sufficiency units regardless of employment status – Minimum earned income for households members subject to the LHA’s self-sufficiency work requirement will be calculated based on the following: Self-Sufficiency I units - 52 weeks x 37.5 hours x federal minimum wage; and, Self-Sufficiency II units - 52 weeks x 20 hours x federal minimum wage. The amount of assumed annual income will be modified when the federal minimum wage is updated. This requirement is a condition of admissions and continued occupancy for all families who accept self-sufficiency units. Families whose head/co-head is a full-time student, are exempted.
- b) Modify the Definition of Work Activity used to determine whether or not a family is compliant with the self-sufficiency requirements. In order to ensure that the employment activities sought by residents will enable them to earn at least the minimum imputed earned income, the LHA received permission to create a local definition of "work activity," which limits compliant work activities to paid activities that are most likely to ensure families' incomes at least equal the minimum imputed earned income amount. Instead of using the requirements found at 42 USC 607(d), the LHA now defines “work activity” as follows:
 - a) Unsubsidized employment;
 - b) Subsidized private sector employment;
 - c) Subsidized public sector employment;
 - d) Paid on-the-job training

Authorization to Expand Current Self-Sufficiency Requirements to the Revitalized Pimlico Units

In addition, the LHA received approval to require Self-Sufficiency Level II Admissions and Continued Occupancy Rules at Centre Meadows (formerly Pimlico Apartments) post-revitalization. Centre Meadows is a 206-unit site converted from public housing to project-based voucher through the Rental Assistance Demonstration (RAD) Program. Renovation is expected to be complete in fall of 2015. Returning families are exempt from these requirements for one year following re-occupancy.

Non-Significant Changes or Modifications During FY2016

The LHA does not anticipate any non-significant changes or modifications during the FY2016 Plan year.

Changes or Modifications to the Metrics, Baselines or Benchmarks During FY2016

There have been no changes to benchmarks and/or metrics for this activity.

Attachment C or D Authorization(s) Changes

There have been no changes in Attachment C or D authorizations since this activity was proposed and approved.

Significant Changes or Modifications to the Activity Since Approval

There are no significant changes or modifications to the activity as previously proposed and approved.

Activity 14) Rent Reform: Elimination of Earned Income Disallowance

Plan Year Activity Approved and Implemented

This activity was proposed in the FY2015 MTW Annual Plan and implemented during FY2015.

Description

LHA staff proposes to eliminate the Earned Income Disallowance (EID) calculation for public housing and HCV households. Currently, federal regulations mandate the exclusion of earnings for public housing households in the following cases:

- The household income increases as a result of employment of a family member who was previously unemployed for one or more years.
- Families whose income increases during the participation of a family member in any economic self-sufficiency or other job training program.
- Families who are or were, within 6 months, assisted under a State TANF or Welfare-to-Work program.

In the Housing Choice Voucher Program, the EID calculation only applies to disabled family members in the following cases (This activity does not apply to treatment group participants in the HCV Rent Reform Study.):

- Families whose income increases as a result of employment of a disabled family member who was previously unemployed (defined as working less than 10 hours a week at the established minimum wage) for one or more years.
- Families whose income increases during the participation of a disabled family member in any economic self-sufficiency or other job training program.
- Persons with disabilities who are or were, within 6 months, assisted under a State TANF or Welfare-to-Work program for at least \$500.

An individual family member is eligible for the EID for a maximum of 24 consecutive months with an overall lifetime limit of 48-months. During the first 12 months 100% of earned income is excluded, while 50% of earned income is excluded during the second 12 months.

Staff reports that the EID calculation is only available to a very small population because of the very specific requirements for the disallowance. Monitoring the family members who receive the EID calculation from hire date through 48 cumulative months is difficult to track because households don't always report when employment status starts and stops. In addition, many who do receive the benefit quit their jobs at the end of the two year exclusion to avoid an increase in the household rent. For those reasons and the administrative burden, the LHA proposes to eliminate the EID calculation.

Staff reports that the elimination of the EID has been extremely helpful in making more efficient use of time to complete other housing management tasks.

This activity will reduce costs and achieve greater cost effectiveness in federal expenditures.

Non-Significant Changes or Modifications During FY2016

The LHA does not anticipate any non-significant changes or modifications during the FY2016 Plan year.

Changes or Modifications to the Metrics, Baselines or Benchmarks During FY2016

There have been no changes to benchmarks and/or metrics for this activity.

Attachment C or D Authorization(s) Changes

There have been no changes in Attachment C or D authorizations since this activity was proposed and approved.

Significant Changes or Modifications to the Activity Since Approval

There are no significant changes or modifications to the activity as previously proposed and approved.

15) Limit HCV Landlord Rent Increases to the least of 2%, HUD Fair Market Rent (FMR), or the comparable rent**Plan Year Activity Approved and Implemented**

This activity was proposed in the FY2015 MTW Annual Plan and implemented during FY2015.

Description

LHA staff proposes to limit annual contract rent increases for participating landlords to the least of a 1) 2% increase in current contract rent, 2) HUD's FMR or 3) the comparable rent. HCV staff has noticed that landlords are willing to lower the rent to comply with the 40% cap of a participant's monthly adjusted income at initial move in but at subsequent renewals will request a rent increase at a percentage which places a financial hardship on the family. In some cases, families are faced with the dilemma of possible eviction from the unit or have to uproot the family to move to a less expensive unit.

This activity will reduce cost and achieve greater cost effectiveness in federal expenditures by reducing the time HCV staff spends processing moves, which includes an interim examination and inspection of a new unit.

This activity will limit the number of families that need to move because their rent becomes unaffordable, thereby reducing the administrative cost burden associated with processing moves.

Non-Significant Changes or Modifications During FY2016

The LHA does not anticipate any non-significant changes or modifications during the FY2016 Plan year.

Changes or Modifications to the Metrics, Baselines or Benchmarks During FY2016

There have been no changes to benchmarks and/or metrics for this activity.

Attachment C or D Authorization(s) Changes

There have been no changes in Attachment C or D authorizations since this activity was proposed and approved.

Significant Changes or Modifications to the Activity Since Approval

There are no significant changes or modifications to the activity as previously proposed and approved.

Activity 16) HCV Rent Reform Study**Plan Year Activity Approved and Implemented**

This activity was approved and implemented in April 2015. Random assignment for the study and control group was done in March 2015.

Description

Lexington Housing Authority (LHA) has been selected to participate in a study commissioned by the U.S. Department of Housing and Urban Development (HUD) to evaluate a Housing Choice Voucher (HCV) alternative rent reform policy (the “Study”). MDRC, a nonprofit research organization, is conducting the Study on behalf of HUD. The Study sets forth alternative rent calculation and recertification strategies that will be implemented at several public housing authorities across the country in order to fully test the policies nationally. The centerpiece of the new policy is the substitution of triennial recertification of households’ incomes for annual recertification. During the three-year period until a household’s next recertification date, any increase in earnings it achieves will not cause the amount of rent and utilities it pays to go up.

LHA staff began seeing Study participants in mid-April 2015. LHA staff expects to complete enrollment of all Study participants by September 2015.

Non-Significant Changes or Modifications During FY2016

The LHA does not anticipate any non-significant changes or modifications during the FY2016 Plan year.

Changes or Modifications to the Metrics, Baselines or Benchmarks During FY2016

There have been no changes to benchmarks and/or metrics for this activity.

Attachment C or D Authorization(s) Changes

There have been no changes in Attachment C or D authorizations since this activity was proposed and approved.

Significant Changes or Modifications to the Activity Since Approval

There are no significant changes or modifications to the activity as previously proposed and approved.

NOT YET IMPLEMENTED ACTIVITIES**Activity 7) Public Housing Acquisition Without Prior HUD Approval**

Describe any approved activities that were proposed in the Plan, approved by HUD, but have not yet been implemented, and discuss why these activities were not implemented; specify the Plan Year in which the activity was first approved;

Activity Proposed and Approved - FY 2012-2013 Plan

Relief from HUD approvals prior to the acquisition of property will enhance LHA's ability to respond quickly to unique market conditions, making the Authority more competitive with other purchasers in the tight real estate markets typical of low poverty areas of the city. For example, sellers are not always willing to provide the agency with an option of long enough duration to cover the typical amount of time LHA requires to obtain HUD approval for site acquisition.

This relief will apply only to the acquisition of public housing units or vacant land purchased for the development of public housing units in non-impacted areas of the city.

All acquired properties will meet HUD's site selection requirements. Approval from the local HUD office will be sought when a pending real estate acquisition deviates from the selection requirements. Copies of all required forms and appraisals will be maintained at the Authority's main office. After acquisition, all required documentation will also be provided to the HUD field office so HUD officials can ensure that site selection requirements were met and establish records for these new public housing properties in the agency's data systems.

Provide an update on the plan for implementation of the activity;

The LHA did not acquire any public housing properties during FY 2012, FY 2013, FY 2014 or FY2015, so it was not necessary to implement this activity.

Provide a timeline for implementation;

The LHA will develop a timeline for this activity during FY 2016 should the Authority decide to acquire public housing units or land for the development of public housing.

Provide an explanation of any non-significant changes or modifications to the activity since it was approved;

The LHA does not anticipate any non-significant changes or modifications to this activity during FY2016.

Activity 8) Conversion of Appian Hills Public Housing to Project-Based Vouchers

Describe any approved activities that were proposed in the Plan, approved by HUD, but have not yet been implemented, and discuss why these activities were not implemented; specify the Plan Year in which the activity was first approved;

Activity Proposed and Approved - FY 2012-2013 Plan

Activity Significantly Modified in FY2014

While Appian Hills received \$500,000 in ARRA-funded energy improvements (cool roofing materials, new doors, and high-efficiency furnaces and water heaters), this 1970's turnkey development still needs

extensive capital improvements – including façade improvements, new windows, insulation in the exterior walls, and soundproofing between units. As part of this renovation, LHA will explore various ways to reconfigure the site's 27 four-bedroom homes.

LHA continues to work diligently to secure adequate funding to revitalize the Appian Hills public housing development. This site may be rehabilitated in its entirety or in phases, as determined by the Authority. Once a plan for revitalization is agreed upon that includes the substitution of project-based vouchers for public housing subsidies, LHA will submit an appropriate application for disposition of the affected portion(s) of the site as well as a request for tenant protection vouchers for residents of affected units. As all available financial resources are being funneled to Pimlico/Centre Meadows, the rehab of Appian Hills has been put on hold, however staff will continue look for funding sources.

Provide an update on the plan for implementation of the activity;

Should HUD issue a NOFA during FY 2016 that would aid in the redevelopment of Appian Hills, LHA may apply for these funds.

Provide a timeline for implementation;

The LHA does not know when funding resources will be available for implementation of this activity. The LHA will actively seek funding opportunities during FY2016.

Provide an explanation of any non-significant changes or modifications to the activity since it was approved;

The LHA does not anticipate any non-significant changes or modifications to this activity during FY2016.

Activity 9) Development of Project-Based Voucher Units at 800 Edmond Street

Describe any approved activities that were proposed in the Plan, approved by HUD, but have not yet been implemented, and discuss why these activities were not implemented; specify the Plan Year in which the activity was first approved;

Activity Proposed and Approved – LHA's FY2012-FY2013

LHA plans to develop between five and eight project-based 3-bedroom townhomes on a vacant lot owned by the agency on Edmond Street. The property is adjacent to an existing 3-unit public housing site and close to the Authority's Pine Valley Management Office.

LHA is considering several options to finance the new construction at 800 Edmond Street. The Authority may allocate dollars from its program income fund, which in turn was funded through property sales and the collection of development fees associated with the implementation of its previous HOPE VI grants for Charlotte Court and Bluegrass-Aspendale. Alternatively, LHA may seek outside funds from a non-federal source.

The flexibilities provided through this MTW activity will be used to project-base the units at Edmond Street without a competitive process and to exceed the per-building cap typically placed on project-based voucher developments. Current project-based voucher rules limit percentage of project-based units to 25% of the units in the development. The LHA plans to project-base 100% of the units at this site.

Provide an update on the plan for implementation of the activity;

The activity has been not been implemented so that available financial resources could be focused on the rehabilitation of Pimlico/Centre Meadows. The LHA still plans to implement this activity once financial resources become available.

Provide a timeline for implementation;

The LHA will develop a timeline for this activity during FY 2015 should the Authority decide to develop the Edmond Street property.

Provide an explanation of any non-significant changes or modifications to the activity since it was approved;

The LHA does not anticipate any non-significant changes or modifications to this activity during FY2015.

Activity 11) Local, Non-Traditional Use of MTW Funds: Emergency Reserves for Connie Griffith-Ballard Towers

Describe any approved activities that were proposed in the Plan, approved by HUD, but have not yet been implemented, and discuss why these activities were not implemented; specify the Plan Year in which the activity was first approved;

Activity Proposed in FY2012-2013 Plan

Approved with FY2012 – FY2013 Plan Approval

Revised in FY2014 Plan

Revision Approved with FY2014 Plan Approval

Through its FY 2014 MTW Annual Plan, the LHA requested to retain the flexibility to use MTW funds should Ballard Tower (which is attached to an LMHA-owned public housing site, Connie Griffith Manor; serves low-income, elderly households; and is managed, but not owned, by the LHA) require significant emergency capital repairs. MTW funds would only be used if the tax credit investor can demonstrate to the Authority's satisfaction that it does not have the financial resources to complete the repairs itself. Despite the number/extent of unforeseen capital emergencies that might arise, the LHA will provide Ballard Place no more than \$300,000 in emergency funds in total.

When this activity was proposed the LHA did not have a confirmed funding source for sorely needed capital improvements at Ballard. After the activity was approved, the site's tax credit investors informed the LHA that they would indeed have sufficient funds to complete the needed work. Having spent a significant portion of their reserves to fund these improvements the Housing Authority was concerned about their ability to cover any additional emergency capital repairs, which prompted creation of this activity.

Provide an update on the plan for implementation of the activity;

This activity has not yet been implemented, but will be implemented if there is an emergency capital expense necessitating the use of these funds at Ballard Place. LHA is pursuing several options to provide much-needed supportive services to residents of both Connie Griffith Manor and Ballard Place, including onsite case management and health services. To this end, the LHA has hired two service coordinator positions at the towers. The Authority will continue to examine possible avenues to utilize MTW funding flexibility to enhance the provision of services to residents of both towers.

Provide a timeline for implementation;

The LHA will develop a timeline for this activity during FY 2016 should the Authority encounter an emergency that would result in a financial hardship for the property which would necessitate the use of the MTW emergency reserves.

Provide an explanation of any non-significant changes or modifications to the activity since it was approved;

The LHA does not anticipate any non-significant changes or modifications to this activity during FY2015.

SECTION V: SOURCES & USES OF FUNDS

Annual MTW Plan		
V.1. Plan Sources and Uses of MTW Funds		
A. MTW Plan: Sources and Uses of MTW Funds		
Estimated Sources of MTW Funding for the Fiscal Year		
PHAs shall provide the estimated sources and amounts of MTW funding by FDS line item.		
Sources		
FDS Line Item	FDS Line Item Name	Dollar Amount
70500 (70300+70400)	Total Tenant Revenue	4,095,958.00
70600	HUD PHA Operating Grants	23,759,944.00
70610	Capital Grants	300,000.00
70700 (70710+70720+70730+70740+70750)	Total Fee Revenue	1,632,643.00
71100+72000	Interest Income	9,676.00
71600	Gain or Loss on Sale of Capital Assets	0.00
71200+71300+71310+71400+71500	Other Income	81,329.00
70000	Total Revenue	29,879,550.00
Estimated Uses of MTW Funding for the Fiscal Year		
PHAs shall provide the estimated uses and amounts of MTW spending by FDS line item.		
Uses		
FDS Line Item	FDS Line Item Name	Dollar Amount
91000 (91100+91200+91400+91500+91600+91700+91800+91900)	Total Operating - Administrative	\$4,030,784
91300+91310+92000	Management Fee Expense	\$1,632,643
91810	Allocated Overhead	\$0
92500 (92100+92200+92300+92400)	Total Tenant Services	\$0
93000 (93100+93600+93200+93300+93400+93800)	Total Utilities	\$1,806,938
93500+93700	Labor	\$0
94000 (94100+94200+94300+94500)	Total Ordinary Maintenance	\$3,118,380
95000 (95100+95200+95300+95500)	Total Protective Services	\$204,660
96100 (96110+96120+96130+96140)	Total Insurance Premiums	\$546,810
96000 (96200+96210+96300+96400+96500+96600+96800)	Total Other General Expenses	\$194,252
96700 (96710+96720+96730)	Total Interest Expense and Amortization Cost	\$0
97100+97200	Total Extraordinary Maintenance	\$0
97300+97350	Housing Assistance Payments + HAP Portability-In	\$16,959,195
97400	Depreciation Expense	\$1,847,393
97500+97600+97700+97800	All Other Expenses	\$0
90000	Total Expenses	\$20,341,025
Describe the Activities that Will Use Only MTW Single Fund Flexibility		
<p>Included in the LHA's long-term plans, a rewards incentive program to reward positive behavior among LHA households will be piloted during FY2015 at the LHA's HOPE VI development. The LHA has partnered with William Wells Brown Elementary School (WVBES) to offer incentives to students (grades K – 5) who live at the HOPE VI site. 108 children between the ages of 5 – 10 live at the site. The LHA will purchase incentive prizes to be given to rewards recipients.</p>		

The difference between the total revenue and total expense in the Estimated Sources of MTW Funding for the Fiscal year section is due to depreciation and adjustment for tax credit (non-LHA activity).

V.2.Plan.Local Asset Management Plan									
B. MTW Plan: Local Asset Management Plan									
Is the PHA allocating costs within statute?					<input type="text" value="Yes"/>	or	<input type="text" value=""/>		
Is the PHA implementing a local asset management plan (LAMP)?					<input type="text" value=""/>	or	<input type="text" value="No"/>		
<p>If the PHA is implementing a LAMP, it shall be described in an appendix every year beginning with the year it is proposed and approved. The narrative shall explain the deviations from existing HUD requirements and should be updated if any changes are made to the LAMP.</p>									
Has the PHA provided a LAMP in the appendix?					<input type="text" value=""/>	or	<input type="text" value="No"/>		
<input type="text" value="N/A"/>									

SECTION VI: ADMINISTRATIVE

A. Resolution Signed by the Board of Commissioners and Certifications of Compliance

B. The beginning and end dates of when the Plan was made available for public review, public hearing sign-in sheet and # of attendees, etc.

C. KSU Evaluation

A. LHA Board Resolution

RESOLUTION APPROVING THE LHA'S FY 2016 MOVING TO WORK ANNUAL PLAN

WHEREAS, the Lexington-Fayette Urban County Housing Authority (LHA) executed a Moving to Work (MTW) Agreement on November 10, 2011, which provides LHA with the authority to investigate and adopt new policies and to flexibly use HUD funding; and

WHEREAS, as part of the MTW Agreement, an annual plan must be developed and submitted to HUD to formally enable the Authority to fully use the policy and budget flexibility provided to participants in the MTW Program; and

WHEREAS, the U.S. Department of Housing and Urban Development (HUD) approved the LHA's FY 2012 MTW Annual Plan on December 29, 2011; and

WHEREAS, the LHA's FY 2015 MTW Annual Plan was approved by HUD on September 2, 2014, effective through June 30, 2015; and

WHEREAS, LHA has proposed one new activity in the FY 2016 MTW Annual Plan that will allow public housing tenants one interim request annually for a reduction in rent between regularly scheduled re-examination periods, identified as MTW Activity 17; and

WHEREAS, the LHA has proposed revisions to the Hardship Policy for all MTW activities (excluding Activity 16 – HCV Rent Reform Study), in addition to modifying the local version of HUD Form 9886 – Local Authorization for the Release of Information for households that have triennial recertification (MTW Activities 3 and 16) to extend the expiration date to 40 months; and

WHEREAS, a Board Resolution approving the proposed FY 2015 MTW Annual Plan and required Certifications must be included in the submission provided to HUD; and

WHEREAS, LHA staff has distributed the Annual Plan to the Board of Commissioners, has allowed thirty days from April 10, 2015 through May 10, 2015 for the public to comment on the Plan, and has conducted a Public Hearing on May 5, 2015 to discuss the proposed Annual Plan before its submission to HUD,

NOW, THEREFORE, BE IT RESOLVED BY THE LEXINGTON-FAYETTE URBAN COUNTY HOUSING AUTHORITY BOARD OF COMMISSIONERS that the FY 2016 MTW Annual Plan is approved, and that the Executive Director, Austin Simms, is hereby authorized to submit this Annual Plan and the required Certifications to the U.S. Department of Housing and Urban Development.



Kyna Kech, Chairperson
Board of Commissioners

May 21, 2015

Date

Form 50300: Elements for the Annual MTW Plan and Annual MTW Report	
Attachment B	
Certifications of Compliance	
<p style="text-align: center;">Annual Moving to Work Plan Certifications of Compliance</p> <p style="text-align: center;">U.S. Department of Housing and Urban Development Office of Public and Indian Housing</p> <p style="text-align: center;">Certifications of Compliance with Regulations: Board Resolution to Accompany the Annual Moving to Work Plan*</p> <p>Acting on behalf of the Board of Commissioners of the Public Housing Agency (PHA) listed below, as its Chairman or other authorized PHA official if there is no Board of Commissioners, I approve the submission of the Annual Moving to Work Plan for the PHA fiscal year beginning <u>July 1, 2015</u>, hereinafter referred to as "the Plan", of which this document is a part and make the following certifications and agreements with the Department of Housing and Urban Development (HUD) in connection with the submission of the Plan and implementation thereof:</p> <ol style="list-style-type: none"> 1. The PHA published a notice that a hearing would be held, that the Plan and all information relevant to the public hearing was available for public inspection for at least 30 days, that there were no less than 15 days between the public hearing and the approval of the Plan by the Board of Commissioners, and that the PHA conducted a public hearing to discuss the Plan and invited public comment. 2. The PHA took into consideration public and resident comments (including those of its Resident Advisory Board or Boards) before approval of the Plan by the Board of Commissioners or Board of Directors in order to incorporate any public comments into the Annual MTW Plan. 3. The PHA certifies that the Board of Directors has reviewed and approved the budget for the Capital Fund Program grants contained in the Capital Fund Program Annual Statement/Performance and Evaluation Report, form HUD-50075.3. 4. The PHA will carry out the Plan in conformity with Title VI of the Civil Rights Act of 1964, the Fair Housing Act, section 504 of the Rehabilitation Act of 1973, and title II of the Americans with Disabilities Act of 1990. 5. The Plan is consistent with the applicable comprehensive housing affordability strategy (or any plan incorporating such strategy) for the jurisdiction in which the PHA is located. 6. The Plan contains a certification by the appropriate State or local officials that the Plan is consistent with the applicable Consolidated Plan, which includes a certification that requires the preparation of an Analysis of Impediments to Fair Housing Choice, for the PHA's jurisdiction and a description of the manner in which the PHA Plan is consistent with the applicable Consolidated Plan. 7. The PHA will affirmatively further fair housing by examining its programs or proposed programs, identify any impediments to fair housing choice within those programs, address those impediments in a reasonable fashion in view of the resources available and work with local jurisdictions to implement any of the jurisdiction's initiatives to affirmatively further fair housing that require the PHA's involvement and maintain records reflecting these analyses and actions. 8. The PHA will comply with the prohibitions against discrimination on the basis of age pursuant to the Age Discrimination Act of 1975. 9. The PHA will comply with the Architectural Barriers Act of 1968 and 24 CFR Part 41, Policies and Procedures for the Enforcement of Standards and Requirements for Accessibility by the Physically Handicapped. 10. The PHA will comply with the requirements of section 3 of the Housing and Urban Development Act of 1968; Employment Opportunities for Low- or Very-Low Income Persons, and with its implementing regulation at 24 CFR Part 135. 11. The PHA will comply with requirements with regard to a drug free workplace required by 24 CFR Part 24, Subpart F. 12. The PHA will comply with requirements with regard to compliance with restrictions on lobbying required by 24 CFR Part 87, together with disclosure forms if required by this Part, and with restrictions on payments to influence Federal transactions, in accordance with the Byrd Amendment and implementing regulations at 49 CFR Part 24. 13. The PHA will comply with acquisition and relocation requirements of the Uniform Relocation Assistance and Real Property Acquisition Policies Act of 2000 and implementing regulations at 49 CFR Part 24 as applicable. 14. The PHA will take appropriate affirmative action to award contracts to minority and women's business enterprises under 24 CFR 8.328(e). 15. The PHA will provide HUD or the responsible entity any documentation needed to carry out its review under the National Environmental Policy Act and other related authorities in accordance with 24 CFR Part 58. Regardless of who acts as the responsible entity, the PHA will maintain documentation that verifies compliance with environmental requirements pursuant to 24 Part 58 and 24 CFR Part 50 and will make this documentation available to HUD upon its request. 16. With respect to public housing the PHA will comply with Davis-Bacon or HUD determined wage rate requirements under section 12 of the United States Housing Act of 1937 and the Contract Work Hours and Safety Standards Act. 17. The PHA will keep records in accordance with 24 CFR 25.20 and facilitate an effective audit to determine compliance with program requirements. 18. The PHA will comply with the Lead-Based Paint Poisoning Prevention Act and 24 CFR Part 35. 19. The PHA will comply with the policies, guidelines, and requirements of OMB Circular No. A-87 (Cost Principles for State, Local and Indian Tribal Governments) and 24 CFR Part 85 (Administrative Requirements for Grants and Cooperative Agreements to State, Local and Federally Recognized Indian Tribal Governments). 20. The PHA will undertake only activities and programs covered by the Plan in a manner consistent with its Plan and will utilize covered grant funds only for activities that are approvable under the Moving to Work Agreement and Statement of Authorizations and included in its Plan. 21. All attachments to the Plan have been and will continue to be available at all times and all locations that the Plan is available for public inspection. All required supporting documents have been made available for public inspection along with the Plan and additional requirements at the primary business office of the PHA and at all other times and locations identified by the PHA in its Plan and will continue to be made available at least at the primary business office of the PHA. 	<p>Leakington-Fayette Urban County Housing Authority KY006</p> <p>PHA Name PHA Number/HA Code</p> <p>I hereby certify that all the information stated herein, as well as any information provided in the accompaniment herewith, is true and accurate. Warning: HUD will prosecute false claims and statements. Conviction may result in criminal and/or civil penalties. (18 U.S.C. 1001, 1010, 1012; 31 U.S.C. 3729, 3802)</p> <p>Elyse Koch PHA Board Chairperson</p> <p>Name of Authorized Official Title</p> <p> 8/20/2015</p> <p>Signature Date</p> <p><small>*Must be signed by either the Chairman or Secretary of the Board of the PHA's legislative body. This certification cannot be signed by an employee unless authorized by the PHA Board to do so. If this document is not signed by the Chairman or Secretary, documentation such as the by-laws or authorizing board resolution must accompany this certification.</small></p>

B. Public Comment Documents

PUBLIC HEARING ANNOUNCEMENT



Lexington Housing Authority

Lexington-Fayette Urban County Housing Authority (LHA) Public Hearing Regarding Revisions to the: 1) FY 2016 Moving to Work (MTW) Annual Plan; 2) Public Housing Admissions and Continued Occupancy Policy (ACOP); and 3) Housing Choice Voucher (Section 8) Administrative Plan

There will be a public hearing on **Tuesday, May 5, 2015 at 5:30 PM** at LHA's Central Office, located at 300 W. New Circle Rd, Lexington, KY 40505. Accommodations for disabled or non-English speaking persons will be made available upon advance request. The subject of the meeting will be LHA's FY 2016 MTW Annual Plan that includes one new activity and revisions to the hardship policy; proposed modifications to the Public Housing ACOP that include a preference for veterans; proposed modifications to the Housing Choice Voucher (Section 8) Administrative Plan that include a preference for veterans and a local residency preference for residents of Kentucky.

LHA welcomes public comment regarding these changes from April 10 – May 10, 2015. Complete copies of the affected documents (and a summary of proposed changes to each) have been posted on the LHA website (www.lexha.org), are available for public viewing at LHA's Central Office, or can be mailed upon request. Written comments should be addressed to Andrea Wilson at LHA's Central Office or emailed to wilsona@lexha.org. For additional information, call (859) 281-5060. Persons with hearing or speech impairments can receive assistance contacting the LHA by dialing 7-1-1 to reach the Kentucky Telephone Relay Service.

**LHA Public Hearing
Sign-In Sheet
5:30 p.m. – Tuesday, May 5, 2015**

Name	Address	Email Address/Phone #
Andrea Wilson	LHA	281-5063
Dana Mason	LHA	281-5057
Cathy Hall	LHA	281-5032
Anderson, M. White	LHA	281-5086
Allean Pleasant	LHA	281-5025
Tonya Chibozo	LHA	281-5026
BARRY HOLMES	LHA	281-5012
Roy Whitehead	LHA	281-5044
Quinn F. Kacey	LHA	281-5027
Sean Cooper	LHA	281-5031
Dorey Holmes	LHA	281-5049

C. KSU Evaluation

Since entering the Demonstration, the LHA has partnered with Kentucky State University to evaluate our rent reform MTW activities. KSU has oversight of the MTW program evaluation process, with an overall mandate to assess, monitor and report on the effects of MTW initiatives, including the proposed rent reform initiatives to be undertaken in FY2016. The central goal of the rent reform evaluation is to measure the overall effectiveness of the rent reform in accomplishing HUD's stated goals of: increasing the number and quality of affordable housing choices throughout the Lexington-Fayette community, increasing the number of families moving toward self-sufficiency, strengthening the number of community partnerships benefitting residents with special needs, and reducing administrative costs while limiting administrative burdens placed on staff and residents. In addition, the evaluation will consider potential disparate impacts on protected classes of residents as determined by sex, race, ethnicity, age and disability.

D. The Annual Statement/Performance and Evaluation Report (HUD 50075.1)

Annual Statement/Performance and Evaluation Report
Capital Fund Program, Capital Fund Program Replacement Housing Factor and
Capital Fund Financing Program

U.S. Department of Housing and Urban Development
Office of Public and Indian Housing
OMB No. 2577-0226
Expires 06/30/2017

Part I: Summary					
PHA Name: Lexington-Fayette Urban County Housing Authority		Grant Type and Number Capital Fund Program Grant No: KY36P00450115 Replacement Housing Factor Grant No: Date of CFFP:		FFY of Grant: 2015 FFY of Grant Approval:	
Type of Grant <input checked="" type="checkbox"/> Original Annual Statement <input type="checkbox"/> Reserve for Disasters/Emergencies <input type="checkbox"/> Revised Annual Statement (revision no:) <input type="checkbox"/> Performance and Evaluation Report for Period Ending: <input type="checkbox"/> Final Performance and Evaluation Report					
Line	Summary by Development Account	Total Estimated Cost		Total Actual Cost ¹	
		Original	Revised ²	Obligated	Expended
1	Total non-CFP Funds				
2	1406 Operations (may not exceed 20% of line 21) ³				
3	1408 Management Improvements				
4	1410 Administration (may not exceed 10% of line 21)				
5	1411 Audit				
6	1415 Liquidated Damages				
7	1430 Fees and Costs				
8	1440 Site Acquisition				
9	1450 Site Improvement				
10	1460 Dwelling Structures				
11	1465.1 Dwelling Equipment—Nonexpendable				
12	1470 Non-dwelling Structures				
13	1475 Non-dwelling Equipment				
14	1485 Demolition				
15	1492 Moving to Work Demonstration		1,070,421		
16	1495.1 Relocation Costs				
17	1499 Development Activities ⁴				

¹ To be completed for the Performance and Evaluation Report.

² To be completed for the Performance and Evaluation Report or a Revised Annual Statement.

³ PHAs with under 250 units in management may use 100% of CFP Grants for operations.

⁴ RHF funds shall be included here.

Annual Statement/Performance and Evaluation Report
Capital Fund Program, Capital Fund Program Replacement Housing Factor and
Capital Fund Financing Program

U.S. Department of Housing and Urban Development
Office of Public and Indian Housing
OMB No. 2577-0226
Expires 06/30/2017

Part I: Summary					
PHA Name: Lexington-Fayette Urban County Housing Authority		Grant Type and Number Capital Fund Program Grant No: KY36P00450115 Replacement Housing Factor Grant No: Date of CFFP:		FFY of Grant: 2015 FFY of Grant Approval:	
Type of Grant <input checked="" type="checkbox"/> Original Annual Statement <input type="checkbox"/> Reserve for Disasters/Emergencies <input type="checkbox"/> Revised Annual Statement (revision no:) <input type="checkbox"/> Performance and Evaluation Report for Period Ending: <input type="checkbox"/> Final Performance and Evaluation Report					
Line	Summary by Development Account	Total Estimated Cost		Total Actual Cost ¹	
		Original	Revised ²	Obligated	Expended
18a	1501 Collateralization or Debt Service paid by the PHA				
18ba	9000 Collateralization or Debt Service paid Via System of Direct Payment				
19	1502 Contingency (may not exceed 8% of line 20)				
20	Amount of Annual Grant: (sum of lines 2 - 19)		1,070,421		
21	Amount of line 20 Related to LBP Activities				
22	Amount of line 20 Related to Section 504 Activities				
23	Amount of line 20 Related to Security - Soft Costs				
24	Amount of line 20 Related to Security - Hard Costs				
25	Amount of line 20 Related to Energy Conservation Measures				
Signature of Executive Director		Date		Signature of Public Housing Director	
				Date	

¹ To be completed for the Performance and Evaluation Report.

² To be completed for the Performance and Evaluation Report or a Revised Annual Statement.

³ PHAs with under 250 units in management may use 100% of CFP Grants for operations.

⁴ RHF funds shall be included here.

U.S. Department of Housing and Urban Development
Office of Public and Indian Housing
OMB No. 2577-0226
Expires 06/30/2017

² To be completed for the Performance and Evaluation Report.

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KY004000002								
Pine Valley	Fencing Replacement	1450	32 units	15,000				
	Storm Door Replacement	1460	32 units	48,000				
	Sub-Total			63,000				
Rogers Manor	Retaining wall repair	1450	10 units	2,500				
	Sub-Total			2,500				
McCullough Drive	Retaining wall repair	1450	14 units	2,500				
	Sub-Total			2,500				
Rosemary	Window replacement	1460	26 units	53,910				
	Sub-Total			53,910				
Scattered Single-Family Housing	Driveway replacement	1450	1 unit	10,000				
	Kitchen cabinet replacement	1460	2 units	10,000				
	Sub-Total			20,000				
	Total Project KY004000002			141,910				
KY004000003								
Scattered Single-Family Housing	Driveway/apron/sidewalk repair/replacement	1450	14 units	14,800				
	Porch replacement; exterior painting; interior flooring replacement	1460	14 units	57,725				
	Total Project KY004000003			72,525				
KY004000004								
Connie Griffith	Energy Management System Replacement	1460	183 units	15,000				
	Total Project KY004000004			15,000				

KY004000010								
Bluegrass Apartments	Hot water tank replacement	1460	32 units	19,231				
	Total Project KY004000010			19,231				
KY004000013								
Bluegrass Phase III	Multifamily Buildings exterior entrance doors, door locks, & security software repair/replacement/upgrade	1460	24 units	12,500				
	Total Project KY004000013			12,500				
KY004000015								
Bridlewood Apts.	Multifamily Buildings exterior entrance doors, door locks, & security software repair/replacement/upgrade	1460	56 units	32,500				
	Total Project KY004000015			32,500				
KY004000033								
Grand Oaks Apts.	Multifamily Buildings exterior entrance doors, door locks, & security software repair/replacement/upgrade	1460	60 units	50,000				
	Total Project KY004000033			50,000				

¹ To be completed for the Performance and Evaluation Report or a Revised Annual Statement.² To be completed for the Performance and Evaluation Report.

U.S. Department of Housing and Urban Development
Office of Public and Indian Housing
OMB No. 2577-0226
Expires 06/30/2017

¹ Obligation and expenditure end dated can only be revised with HUD approval pursuant to Section 9j of the U.S. Housing Act of 1937, as amended.

U.S. Department of Housing and Urban Development
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¹ Obligation and expenditure end dated can only be revised with HUD approval pursuant to Section 9j of the U.S. Housing Act of 1937, as amended.

APPENDIX A – HARDSHIP POLICY

The LHA's current hardship policies for Activity 1 – Increase in Minimum Rent and Activity 13 – Local Self-Sufficiency Admissions and Occupancy for public housing Self-Sufficiency I and II units have been revised as follows. This policy is applicable to all other LHA housing programs excluding the HCV Rent Reform Study and Activity 17.

A Hardship Review Committee will be created to review individual cases of significant rent burdens or rent increases for families. Residents can request a Hardship Waiver Request form from their housing management office. The Hardship Review Committee will review hardship requests on a case-by-case basis.

The hardship committee will consist of at least two people one of which must be a senior LHA public housing or housing choice voucher management staff member.

In order to qualify for a hardship exemption, the household must provide proof it is unable to continue to pay the current rent share because of a financial hardship, including:

- The family's income has decreased because of loss of employment through no fault of the family and the family demonstrates efforts towards regaining employment;
- A death has occurred in the family which eliminates a prior source of income; or
- Other circumstances determined to warrant an exemption by the LHA.

The qualifying financial hardship must be long-term (a minimum of 4 months) and will set the household's Total Tenant Payment (TTP) at 30 percent of current income, but no lower than the minimum rent for up to six (6) months.

Until the request for a hardship exemption is reviewed and approved by the LHA Hardship Review Committee, the participating household is expected to continue to pay its portion of the rent and utilities as previously agreed. The family is required to abide by all other requirements for continued occupancy and failure to do so is grounds for termination/eviction.

The Hardship Review Committee will send decisions to the housing manager within five (5) business days of receiving verification of all necessary information, such as income, social security benefits, etc., associated with the hardship request.

If the resident disagrees with the Hardship Review Committee's decision they can request a grievance hearing. The LHA will take no action to change a resident's rent in cases where a grievance hearing has been requested until such time as the grievance process has concluded.

If the resident is approved for a hardship and the hardship expires, the resident can re-apply as needed. There is no limit on the number of hardship requests that can be made.

The Hardship Review Committee will consist of at least two people. One of whom will be a member of LHA's senior staff. Public Housing management teams or HCV management will not review hardship requests submitted for tenants that report to their management team or HCV office.